

**ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
BUREAU OF AIR**

September 2005

**Responsiveness Summary
for Public Questions and Comments on the Construction Permit Application from
Metropolitan Biosolids, LLC**

Site Identification No.: 031051APL
Application No.: 04110024

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INTRODUCTION

Metropolitan Biosolids Management, LLC, (MBM) submitted an application to the Illinois EPA Bureau of Air for a permit to construct a sewage sludge drying plant on the grounds of the Metropolitan Water Reclamation District of Greater Chicago's (MWRDGC's) existing Stickney wastewater treatment plant. After review of the application, the Illinois EPA prepared a draft construction permit. A comment period was opened by the Illinois EPA to receive comments on the proposed project and draft permit.

Upon review of comments received during the public comment period and final review of the application, the Illinois EPA has determined that the project meets the standards for issuance of a construction permit. Accordingly, on September 8, 2005, the Illinois Environmental Protection Agency (Illinois EPA) issued a construction permit to MBM for the project.

DESCRIPTION OF PROPOSED PROJECT

The proposed plant would dry wet sludge in four identical drying lines. All material handling and processing activities at the plant would be enclosed. As described in the application, the proposed plant is designed to handle approximately one third of the wet sludge produced by the Stickney wastewater treatment plant. This material is also referred to as "biosolids" by MBM. Biosolids is a term adopted by USEPA for the nutrient-rich organic material resulting from the treatment of wastewater. The use of biosolids as fertilizer is regulated by USEPA to assure that such material can be safely applied to maintain and improve soils and support plant growth.

Wet sludge material with a moisture content of approximately 75 percent by weight would be received at the proposed plant by an enclosed conveying system and stored in four silos, one for each drying line. From the silos, the wet material would be pumped to hoppers and then to mixers or "coaters," which combine the wet material with material that has already been dried. The coaters would then feed the dryers. These wet material handling operations would be enclosed in the processing building, with emissions controlled by a two-stage scrubber system. This system is designated the "Odor Control Scrubbing System" by MBM, as it is designed to control emissions of odorous compounds, as well as emissions of particulate matter (PM) and volatile organic material (VOM). This system would exhaust to the atmosphere through an 85 foot tall stack.

The wet material would be dried in four indirectly heated dryers. The dryers would be heated by circulating hot "thermal oil" through tubes in each dryer, so that wet material would not be exposed to or come into contact with any combustion gases. The exhaust from each of the four dryer units would first pass through its own condenser to remove moisture and then its own scrubber for control of particulate. These four systems would then exhaust to a common thermal oxidizer system for control of VOM. This oxidizer system would have two afterburners, a primary unit and a back-up unit. This system would exhaust to the atmosphere through the same 85-foot tall stack as the Odor Control Scrubber System.

The dried material from each dryer would pass to a series of processes to separate undersize "fine" material and oversize material from pellets of dried material that are in the desired size range for

the product (about 1/8 inch). Pellets of the proper size would continue on to the product storage silos, to await bulk shipment by truck. Oversize and undersize material would be returned to the coaters, to go back through the dryers. The emissions from handling and processing of dry material would first be controlled by fabric filters. The exhaust from the filter for the pellet cooler on each drying line, in which warm pellets from the dryers are cooled, would then be ducted to the common thermal oxidizer system. The exhausts from the filters on the other processes would then be ducted to the odor control scrubber system.

The thermal oil circulated through the dryers would be heated in three oil-fired heaters, each with a rated capacity of 27 million Btu per hour. These heaters may be fired with used or reclaimed oil, as well as virgin fuel oil. These heaters will be equipped with low NO_x burners for the control of nitrogen oxide (NO_x) emissions. The exhaust from the heaters will be vented to a two-stage scrubber system. The first scrubber in the system will be a Venturi scrubber designed for control of particulate matter emissions. This will be followed by a caustic scrubber for control of emissions of sulfur dioxide (SO₂).

COMMENT PERIOD AND PUBLIC HEARING

The Illinois EPA Bureau of Air evaluates applications and issues permits for sources of emissions to the atmosphere. An air permit application must appropriately address compliance with applicable air pollution control laws and regulations before a permit can be issued. Following its initial technical review of the MBM application, the Illinois EPA Bureau of Air made a preliminary determination that the project met the standards for issuance of a construction permit and prepared a draft permit for public review and comment.

The public comment period began on June 5, 2005, with the publication of a notice in the Berwyn/Cicero/Stickney Edition of the Suburban LIFE newspaper. Additional notices were published in this paper on June 12 and 19, 2005. Additionally, Spanish and English versions of the notice were placed in the Lawndale News on June 8, 15, and 22, 2005.

A public hearing was held on July 20, 2005, at Alessandro's Banquet, 6040 West Cermak Road in Cicero to receive oral comments and answer questions regarding the application and draft air permit. The comment period closed on August 19, 2005.

AVAILABILITY OF DOCUMENTS

Copies of the final Permit and this Responsiveness Summary are available through the following means:

1. By viewing the documents at one of the following repositories:

Illinois EPA – Des Plaines	Illinois EPA
Regional Office	
9511 West Harrison	1021 North Grand Avenue, East
Des Plaines, IL	Springfield, IL 62794
847/294-4000	217/782-7027

2. By contacting the Illinois EPA by telephone, facsimile or electronic mail:

Illinois EPA
Bradley Frost, Office of Community Relations
217-782-7027 Desk line
217-782-9143 TDD
217-524-5023 Facsimile
brad.frost@epa.state.il.us

3. By accessing the World Wide Web at www.epa.gov/region5/air/permits/ilonline.htm (look under All Permit Records, State Construction Permit, New).

To obtain a printed copy of the documents by mail and free of charge, please use the contact information listed in #2 above.

QUESTIONS AND COMMENTS

1. Where is the dried sludge material going to be disposed, ...on farms, ...in this country?

MBM has stated that it plans to sell the dried sludge material to golf courses and similar commercial establishments for use as a fertilizer and soil amendment. Because material would be in a dry and stable form, material could be sold to customers that are some distance from the proposed plant. However due to transportation costs, MBM expects that its biggest market would be in the greater Chicago area. It is also unlikely that material would be shipped outside of the United States.

2. How many stacks would the proposed plant have?

The plant would have a single 90-foot stack, which would serve all the operations at the plant.

3. What are scrubbers? Do they wear out? If so, how are they replaced and disposed of?

A scrubber is a type of emission control device in which pollutants are removed from a gas stream by passing the stream through a shower of liquid; commonly water, to wash out contaminants. In general, particles are removed by collision with droplets. Gaseous contaminants are absorbed into

the liquid and additives may be added to the scrubbant liquid to facilitate the absorption process. Fresh liquid or scrubbant is added to the scrubber either continuously or periodically depending on the design of the scrubber. Used scrubbant, containing the collected contaminants, is removed from the scrubber for appropriate processing, either for reuse or disposal, with the type of processing depending on the nature of the contaminants that have been collected. When water is the scrubbant, used scrubbant is often processed by pretreatment at the source followed by treatment at the local sewage treatment plant serving a source.

Like any mechanical device, scrubbers are subject to wear and must be appropriately maintained and repaired. With careful operation and appropriate replacement of components, i.e., spray nozzles, packing material, pumps, valves, etc.; scrubbers are reliable devices to control emissions. When the scrubbers at the proposed plant reach the end of their useful life, i.e., the level of maintenance required becomes very high, the scrubbers can be readily replaced with new units.

4. Do emissions result from the chemical reaction of the scrubbant with the exhaust gases?

No. While there may be chemical reactions between the additive in a scrubbant and a gaseous contaminant that is being controlled, scrubbers are designed so that the product of the reaction also remains in the scrubbant. For example, when sulfur dioxide is scrubbed with water to which caustic (sodium hydroxide) has been added, sodium sulfate is formed. This is also a solid material that remains in solution in the water.

5. How has the proposed plant changed since the original proposal several years ago?

Minor changes have occurred between the original proposal for the plant and the current proposal. For example, the design of the plant has gone from four thermal oil heaters, each at 20 million Btu/hour (total capacity 80 million Btu/hour), to three heaters, each at 27 million Btu/hour (total capacity 81 million Btu).

6. Is there a comparable project to this in Illinois?

There is not a plant in Illinois that is comparable to the proposed project. However, the project should not be considered unusual. Mechanical drying of sludge is an established technique for facilitating the disposal of sewage sludge, prior to either land application or landfill disposal. It is more common at large plants located in areas that lack ready access to agricultural land for sludge disposal. As such, drying of sewage sludge is not in common use in Illinois. However, as the Stickney works is a very large wastewater treatment plant in an urban area, it is not surprising that this project has been proposed at the Stickney works.

7. What would be the emissions from this project?

The permitted annual emissions of the plant, as summarized in Attachment A of the permit, would be 14.5 tons of particulate matter, 39.6 tons of nitrogen oxides, 15.3 tons of carbon monoxide, 22.9 tons of sulfur dioxide, and 1.94 tons of volatile organic material. Actual emissions would be less to the extent that the plant operates at less than full capacity and actual emissions are below the maximum levels addressed by the permit.

8. For purposes of the air pollution control rules for major projects, has this project been reviewed as a modification to the Stickney works or as a new source? What are the threshold levels of emissions for a project to be considered a major modification, as compared to being considered a major new source?

For purposes of the applicability of New Source Review (the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21 and the state's rules for Major Stationary Source Construction and Modification (MSSCAM), 35 IAC Part 203), this project has been reviewed as a proposed modification to the Stickney works. The emission levels at which the proposed plant would be considered a major modification under these rules are 15 tons per year for particulate matter, 40 tons per year for volatile organic material, sulfur dioxide, and nitrogen oxide, and 100 tons for carbon monoxide. The plant is being designed and permitted for emissions that are below these major modification levels. If the project could be considered a new source, instead of a modification to an existing source, the emissions thresholds for status as a major project would have been much higher, i.e., 100 tons per year for particulate matter, volatile organic material and nitrogen oxide and 250 tons per year for sulfur dioxide and carbon monoxide.

9. How much does the existing Stickney wastewater treatment plant emit?

The MWRDGC reported emissions from the Stickney works in 2004 of 40.8 tons of carbon monoxide, 36.4 tons of nitrogen oxides, 2.68 tons of particulate matter, 1.63 tons of sulfur dioxide, and 38.2 tons of volatile organic material. However, the Stickney works is permitted as a major source of emissions with a Clean Air Act Permit Program (CAAPP) permit and is permitted to emit more than 100 tons/year of different pollutants.

10. How will the proposed plant affect the level of odor from the Stickney works?

The Illinois EPA does not expect the proposed plant to be a significant source of odor or to significantly affect odors from the Stickney works. In particular, the various operations at the plant would be enclosed inside a building, vented through air pollution control equipment, and discharged through an elevated stack.

11. What does the MWRDGC do to reduce odors?

The MWRDGC is generally working to reduce odors from its wastewater treatment plants by two basic approaches. The first approach is careful operation of the systems at its plants that generate odors to minimize the formation of odors, as it is feasible to do so with the equipment currently in place, in accordance with an Odor Management Plan developed by the MWRDGC. The second approach is the replacement of existing systems over time with newer designs of equipment that reduce or eliminate the potential for odors. The nature and schedule for these replacements is addressed in the Master Plan prepared and maintained by the MWRDGC for the Stickney works.

12. What is the process if odors do increase with the proposed plant?

If odors increase with the proposed plant, as would be determined in response to complaints to the Illinois EPA from the public, the process for responding to an odor nuisance would begin. This starts with an investigation to identify the specific sources and causes of the odor, the practices that are currently in place to prevent or minimize odors, and the changes to operation that could be made to further reduce or eliminate odors. This is followed by development of a set of actions that is determined to be appropriate to improve or correct the situation. Obviously, the odor problems that are simplest to deal with are ones involving upsets or control device failures at a source, which can be dealt with by taking action to prevent similar incidents in the future. With an existing source like the Stickney works, due to the nature of its operation and its size, it is a continuing challenge to make sure that all reasonable opportunities to reduce odors are identified as they become available and are then promptly implemented.

13. How often does the Illinois EPA inspect sources of emissions?

The frequency of the Illinois EPA's on-site an inspection of sources of emissions varies based on the nature and circumstances of a source, with sources with more complex operations and historic compliance problems being subject to more frequent inspections. The most recent inspection of the Stickney works by the Bureau of Air was conducted on May 10, 2005.

Currently, the Bureau of Air's goal is to conduct detailed inspections of all major sources at least every three years. Local authorities and the USEPA may also conduct additional inspections of these sources.

14. Do sources do "self-checking"?

Sources carry out the monitoring, recordkeeping, and other activities required for routine verification of compliance with air pollution control regulations. This is the approach that is commonly taken in environmental regulations. This keeps the principal burden for assuring compliance with environmental requirements on the sources where it belongs. The sources manage the day-to-day operation of emission units and must incorporate environmental compliance

into their daily operation. The role of government authorities is to oversee the activities of sources, to confirm that sources are meeting all their environmental obligations.

15. How can the Illinois EPA verify that the records sources keep are accurate?

One of the functions of on-site inspections of sources is to verify the accuracy of sources' records. This is done by comparing measured data and the source's production data to the information recorded for environmental purposes and by spot-checking historic records. In addition, false recordkeeping and reporting are serious violations that trigger close scrutiny by the Illinois EPA and USEPA and the most severe penalties. In the event of noncompliance, sources are far better off reporting noncompliance than preparing false records and submitting fraudulent reports, which is a criminal violation for which the responsible individuals can be held personally accountable.

16. Are the records of the inspections conducted by the Illinois EPA for sources a public record?

Yes. As public records, copies of inspection reports are available to the public pursuant to the Freedom of Information Act (FOIA). FOIA requests may be made to the Illinois EPA either (1) online at <http://www.epa.state.il.us/foia/>, or (2) by letter (requests may be sent by facsimile). Written FOIA requests and questions about the FOIA process can be directed to the Illinois EPA contact listed at the end of this document.

17. I would feel a lot better if I did not have to make a Freedom of Information Act request to find out how often the Illinois EPA is checking on sources. If this were something that was directly reported by the Illinois EPA, I would feel a lot more comfortable.

As time goes on, the Illinois EPA, as with many public entities, is making more and more information directly available over the Internet. However, the Bureau of Air does not yet have a system for making information concerning sources inspections available on the Internet. Accordingly, at this time, FOIA is the process that must be used to obtain this information. FOIA is the process that state agencies in Illinois must use to provide information that is not otherwise available to ensure that requests for information are handled in an appropriate, thorough, consistent and expeditious manner. The process has set time frames and recourse for individuals who do not receive the information that they have requested.

18. Used oil is not pristine. When oil is recycled or reused many times, the presence of carcinogens in the oil becomes a concern. So if you are recycling oil in another process, don't more carcinogens become part of the particulate matter that is emitted?

Accumulation of organic carcinogens in cooking oil, as generally addressed in this comment, has not been identified as a concern for use of waste oil when it is burned as fuel, as would occur at the proposed plant. There are standards limiting the concentrations of lead and other contaminants

present in used oil that is to be used as fuel. These standards were developed to address various concerns that would be present if those contaminants were present in used oil in higher concentrations. These standards serve to protect the public from the health risks that may potentially be present from the emissions when contaminated used oil is burned.

19. The plant should be equipped with continuous opacity monitoring systems, which are equipped with alarms if the opacity exceeds the applicable standard, i.e., 30 percent.

This permit requires appropriate monitoring of the operating parameters of the control systems to assure they operate effectively to control emissions as well as interlocks with process equipment in the event of a failure of a control system. Further opacity monitoring, as suggested by the comment even if feasible given the use of scrubbers, would not provide additional assurance of proper equipment operation.

20. Continuous emission monitors should be required at all point of emissions, including all critical process operating parameters. Visual and audible alarms should be provided whenever deviations occur.

Continuous emission monitoring is not appropriate at this plant and is not required by the permit. This is due to the relatively low levels of emissions from the plant and the nature of the exhaust points, including a single stack that combines all process exhausts. Continuous monitoring of key operating parameters of control devices is appropriate and is required by the permit. These parametric monitoring systems must be tied into alarms and/or interlocks for the operation of the control devices.

21. For the scrubber used to control emissions of sulfur dioxide from the thermal heaters, the permit should specify operating parameters.

The permit requires monitoring of key operating parameters of this scrubber. It is not appropriate for the construction permit for the plant to specify specific levels of operating parameters that must be maintained. This is because the required levels of these parameters will be set based on operation during emission testing. In addition, it is likely that the operation of this scrubber for control of sulfur dioxide will also be subject to a Compliance Assurance Monitoring Plan, developed and maintained by the source in accordance by 40 CFR 64.

22. It should be noted that 35 IAC 218.301 limits emissions of organic material, not emissions of hazardous air pollutants.

As a general matter, while 35 IAC 218.301 addresses emissions of organic materials, it indirectly addresses emissions of certain hazardous air pollutants, as they also constitute as organic material. In any event, the permit directly addresses emissions of hazardous air pollutants from the plant, with limits on emissions of the principal hazardous air pollutants to assure that the plant is not a

major source of hazardous air pollutants. The permit does not rely upon the indirect effect of 35 IAC 218.301 for this purpose. In this regard, the permit also does not rely on 35 IAC 218.301 to restrict emissions of organic material from the plant but instead establishes explicit limits on emissions of volatile organic material.

23. The permit should require MBM to maintain a log in which it records complaints from the public about odors from the plant, along with its response to complaints, including the results of the investigations that are conducted.

The imposition of the suggested requirements is not appropriate in this construction permit for a proposed plant. This is because it presupposes that there will be odors and complaints associated with the operation of the proposed plant.

24. The permit does not indicate the disposition of the condensate and spent scrubbant or characterize the chemical or physical nature and quantity of these materials.

Condensate and used scrubbant from the proposed plant would constitute wastewater and be returned to the Stickney works for treatment. The nature and quantity of these materials is addressed by regulatory programs for wastewater and is outside the scope of air permitting. However, as the bulk of the wastewater will be effluent from the Stickney works or water contained in the sludge from the Stickney works, which is being returned to the Stickney works, the wastewater should not pose any special concerns for treatment by the Stickney work.

25. The draft permit indicates that the sewage sludge has been fully treated but does not summarize laboratory analysis indicating the chemical or physical characteristics of the sludge, including a radiological analysis. The permit should specify the frequency of sampling and analysis of the wet sludge.

General data for the composition of the sewage sludge or biosolids produced at the Stickney works, as would be processed at the proposed plant, was contained in the permit application. The permit also requires the source to keep records on a continuing basis on the general composition of the sludge that it receives, including identification of analysis methods. This information is sufficient for purposes of the air pollution control permit. Other requirements for sampling and analysis of the sludge produced by the Stickney works apply to the MWRDGC itself, under other regulatory programs.

26. The permit should specify the methods and procedures for measuring the amount or flow rate of the wet sludge material to the proposed plant. The moisture content should be measured at least once a day.

The permit requires MBM to keep records of the amount of material it receives from the Stickney works, with supporting documentation. It is not necessary for the permit to specify the precise

method by which the amount of material received at the plant is determined, as there are a number of different methods by which this could be determined which would be adequate for purposes of the air pollution control permit.

27. Due to the magnitude of the proposed plant's operations, notification for deviations should be provided to the Illinois EPA in 10 days instead of 30 days.

The magnitude of this plant operations does not generally warrant reporting of deviations in 10 days, nor is the magnitude of a plant's operations an appropriate basis to set timing requirements for deviation reporting. Provisions for deviation reporting should be set considering the nature of the potential deviations that could occur at a source.

For this plant, it is appropriate that the permit generally require reporting of deviations within 30 days. Sources are commonly required to report deviations in 30 days. This provides a reasonable amount of time for a source to carefully assemble the information that must be included in a deviation report, including identification of the actions that have been and will be taken to prevent similar incidents. This timing is also more stringent than might be provided, as the permit could identify certain minor deviations that could appropriately be reported on a quarterly basis in a periodic monitoring report. However, the Illinois EPA elected to defer any provisions for quarterly reporting of deviations until action on an application for operating permit for the plant. At that time, actual operating information would be available upon which to base any provisions that would allow for quarterly reporting of deviations.

The construction permit for the plant does recognize one type of deviation for which deviation reporting in less than 30 days is appropriate. This is continued operation of an emission unit during failure of the associated control devices, which should not occur because of the interlock system that is required. For this type of exceptional event, which should never occur, the permit for the plant requires reporting within 10 days of the event.

28. The permit should identify the type of condensers and include their technical specifications.

The condensers in the control train for the dryers, as set forth in the application, would be "tray-type condensers." A tray-type condenser is a type of contact condenser, in which the cooling water and the exhaust stream come into direct contact. It is not necessary to further describe these devices or include their technical specifications in the permit because of the type of equipment and because they are generally being used to prepare the exhaust stream for control of emissions by the downstream scrubbers rather than to directly control emissions themselves. They do this by cooling the exhaust stream and removing moisture, so that the volume of exhaust gas that must be controlled by the downstream scrubbers is smaller. The permit does require continuous monitoring for the temperature of the exhaust stream after it leaves the condensers, before entering the scrubbers, so that the proper operation of the condensers can be directly verified.

29. In the event that a unit at the plant fails to meet an emission limit set by the permit during an emission test, MBM should have 30 days to re-test to show compliance or to suspend operations until it does establish compliance.

It is not appropriate for this permit to include the provision suggested in this comment, as it would set a pre-determined period of time during which a unit could or could not continue to operate in the event of noncompliance. As a general matter, the actions that should be taken in the event of noncompliance must be determined on a case-by-case basis, in the context of a potential enforcement action, considering the specific nature of the noncompliance. If the permit were to include the provision suggested in this comment, it would circumvent this process and could arguably be relied upon by the source as a shield from an enforcement action.

30. Totalizing flow meters should be used to measure the oil usage by the thermal heaters.

MBM has indicated that totalizing flow meter will be installed. However, this has not been made a requirement of the permit because the usage of oil can also be accurately and reliably determined from records of fuel deliveries and gauging of the oil storage tanks.

31. The source should be required to calculate emissions of volatile organic material from the fuel oil storage tanks using the methodology developed by the American Petroleum Institute.

The issued permit requires MBM to maintain records of volatile organic material emissions from the oil storage tanks using emission determination methodology developed and distributed by USEPA, such as its TANKS Program.

32. The fuel oil storage tanks should be equipped with over-fill protection instruments and secondary containment. They should also have vapor conservation vents,

MBM has confirmed that the tanks will be installed with over-fill protection instruments and secondary containment. However, these features are outside the scope of an air pollution control construction permit. Nor does the permit for the proposed plant indicate in any way that the Illinois EPA has considered such requirements in acting on the permit for the plant and that applicable requirements have been satisfied, as explained in Standard Condition 5, as attached to the permit.

MBM has also indicated that the tanks will be equipped with vapor conservation vents. This is a voluntary measure, as applicable regulations do not require conservation vents on fuel oil storage tanks. Accordingly, installation of these vents is not required by the permit.

33. The draft permit would only address air pollution control aspects of the proposed plant. There are other environmental aspects of the proposed plant that also need to be considered. Examples of these other concerns include a water balance and wastewater survey, identification of treatment residuals, and the composition of the dried sludge.

This is correct. As appropriate, these other aspects of the plant are addressed by regulations that are not administered through the air pollution control permitting process.

34. As part of the overall plant design, MBM should include dimensions and capacity of the secondary containment for the sludge silos and over-fill protection instruments for the silos.

MBM has indicated that over-fill instruments will be installed on the sludge silos. However, similar to certain matters addressed in earlier comments, these aspects of the plant are outside the scope of an air pollution control permit.

35. The applicability of National Fire Protection Association (NFPA) Standards and American Petroleum Standards should be considered by MBM in the design and development of the proposed plant. In addition, MBM should consider the applicability of requirements related to a Spill Prevention Containment Control Plan.

MBM has indicated that the above standards and requirements have been and will continue to be taken into account during the design and development of the proposed plant. However, similar to certain matters addressed in earlier comments, these matters are outside the scope of an air pollution control permit.

36. Where would the water for the plant come from? Would it come from the Sanitary and Ship Canal?

The main source of water for the proposed plant would be clean, treated water from the Stickney works, which would otherwise be discharged to the Sanitary and Ship Canal. This water would be used in the condensers in the emission control train for the dryers and in the scrubber for the thermal heaters. As this water would then be returned to the Stickney works as wastewater, this water would effectively be “borrowed” as it would end up in the same place. Fresh water would be used in the odor control scrubber, for which effluent is unsuitable, and for other incidental uses at the plant.

37. Fugitive particulate matter comes into my house when I have my windows open during the summer. When I wipe off the kitchen table, I have brown stuff on my hands. This material is also in the air that I breathe and I believe it is coming from the Stickney works. The proposed plant is going to add to the amount of particulate matter in the air.

The proposed plant will not be a large source of particulate matter emissions and should not contribute to the problem described in this comment. The plant has scrubbers and other pollution control equipment to effectively control emissions of particulate matter from the plant. The situation described in the comment would be more typical of windblown dust from nearby vehicle traffic on an unpaved parking lot or earthmoving activity associated with a construction project if proper dust control measures are not being implemented. Further investigation is appropriate to identify the specific activities or operations that are responsible for the conditions identified in this comment, to allow appropriate action to be initiated to correct these conditions to be corrected.

38. How did the Village of Stickney approve this project? Was it by referendum or was it by the action of village officials?

The Village of Stickney gave approval for the siting of the proposed plant by action of its elected officials. Applicable law provides that a public hearing is required and the governmental body, in this case the Village of Stickney council, subsequently votes to approve or reject the siting of a proposed facility. The factors that must be considered when considering siting approval are listed by the applicable law and include matters such as the design of the proposed facility as related to protection of public safety, health and welfare, compatibility with the character of the surrounding area, and impacts of local traffic flows. The relevant law does not provide for the holding of a referendum as part of the process for reviewing an application for siting of a proposed facility.

39. Has Illinois EPA reviewed the local siting approval to verify that the proposed plant has obtained siting approval from the Village of Stickney.

A copy of the local siting approval was provided to the Illinois EPA in the application. A copy of this document may be obtained from the Illinois EPA by calling the contact at the end of this document.

40. Many residents of Stickney oppose the construction of the proposed plant, as well as any expansion of the Stickney Works.

Comment acknowledged.

41. How were people notified of the public hearing and who was notified?

When the Illinois EPA holds a public comment period on the proposed issuance of a permit for a project, individual notifications are sent by mail to: (1) State legislators in whose district the project

would be located; (2) The mayor and clerk of the community in which the project is located and of other nearby communities; and (3) Specific individuals who have requested that they be notified of public comments periods. For this project, individual notification were also sent by mail to the individuals who attended an earlier public hearing held by the Illinois EPA in February of 2002 on the permitting of the proposed plant.

General notification to the public of this comment period and public hearing was provided by notices published in local newspapers. These notices were published in the Berwyn/Cicero/Stickney LIFE on June 5, 12, and 19, 2005 and in the Lawndale News in both English and Spanish on June 8, 15, and 22, 2005. Because there was a change in the location of the hearing, notices of the public hearing with the new location were also published in the Berwyn/Cicero/Stickney LIFE on July 17, 2005 and in the Lawndale News on July 14, 2005.

FOR ADDITIONAL INFORMATION

Questions about the public comment period and permit decision should be directed to:

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